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AZ CORP COMMISSION
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IN THE MATTER OF THE APPLICATION OF
EPCOR WATER ARIZONA, INC. FOR A
CERTIFICATE OF CONVENIENCE AND
NECESSITY TO PROVIDE WASTEWATER
UTILITY SERVICE IN MARICOPA COUNTY,
ARIZONA.

DOCKET NO. WS-01303A-15-0018

STAFF'S POST HEARING BRIEF

I. INTRODUCTION

On December 17, 2013, EPCOR Water Arizona ("EWAZ" or "Company") filed an application with the Arizona Corporation Commission ("Commission") for an extension of Certificate of Convenience and Necessity ("CC&N"). The application covered territory in the vicinity of the Loop 303. On January 30, 2015, the Company withdrew the application. On January 27, 2015, EWAZ filed the application in this docket for a new CC&N to provide wastewater services for approximately the same territory¹ as had been requested as an extension earlier.

The application was found sufficient on February 26, 2015. Following sufficiency, a procedural schedule was determined for the matter. On May 8, 2015, following discussions between Commission Utilities Division Staff ("Staff") and representatives of the Company, EWAZ submitted additional information supplementing the original application.² The procedural schedule was extended in light of the additional information pursuant to an unopposed Staff request on March 24, 2015. The procedural schedule was extended again by procedural order on May 7, 2015 following a further submission³ of information from the Company.

¹ See e.g. Application filed December 17, 2013 in Docket No. SW-01303A-13-0446 at 4 (noting that prior Loop 303 CC&N extension request was for 3,618 acres).

² See Exhibit A-2.

³ See Exhibit A-3.

1 On Jun 26, 2015 Commission Staff filed its Staff Report in the matter. Staff later filed a
2 Revised Staff Report on July 13, 2015. Based on a review by representatives of the Company, the
3 numerical data related within the Revised Staff Report was accurate.⁴

4 Even so, initial rates recommended by Staff vary significantly from those requested by the
5 Company. As indicated by representatives of both Staff⁵ and EWAZ,⁶ the principal reason for the
6 difference is owing to the regulatory treatment to accord various agreements struck originally by
7 Global Utilities, whose interests were later transferred to EWAZ, and 17 developers⁷ within the
8 proposed service territory.

9 These agreements are of two types. The first type, which apparently have all been executed
10 already, are what have been termed Wastewater Facilities Main Extension Agreements (“WFAs”).⁸
11 WFAs are agreements that EWAZ acquired from Global Utilities which previously sought a CC&N
12 within the same area.⁹ Pursuant to the WFAs, developers advance funds to the Company toward the
13 construction of common regional wastewater treatment facilities and the collection system that are
14 generally characterized as “off-site” facilities.¹⁰ Included with the advance of funds for the facilities
15 was provision for the advance of the land on which to site the facilities.¹¹ Also, the WFAs provide
16 for the advance of funds toward the operation and maintenance of the system during startup
17 operations.¹² The off-site facility is for the purpose of providing a regional treatment facility rather
18 than smaller “package plants.”¹³ The benefit associated with a regional facility is anticipated
19 economy of scale that package plants do not provide.¹⁴

20 The second type of agreement is a variation on a wastewater main extension agreement that
21 would ordinarily be used once a CC&N has been granted. Dubbed Wastewater Facilities Onsite
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23 ⁴ Transcript of July 21, 2015 procedural conference at 8-9.

24 ⁵ Tr. at 16.

24 ⁶ *Id.* at 10-11.

25 ⁷ Exhibit A-1, attached Exhibit 1.

25 ⁸ Exhibit A-1, attached Exhibit 13.

26 ⁹ Tr. at 69, 132; Exhibit S-1, Attachment 2 at 1.

26 ¹⁰ Tr. at 29; Exhibit S-1, Attachment 2 at 1.

27 ¹¹ *Id.* at 33-34, Exhibit S-1 at 2.

27 ¹² Exhibit S-1 Attachment 2 at 4; Tr. at 112.

27 ¹³ Tr. at 26.

28 ¹⁴ *Id.*

1 Extension Agreements (“MXAs”),¹⁵ a sample MXA is attached to the WFA. To Staff’s knowledge,
2 none of the MXAs have been executed yet between EWAZ and the 17 original developers nor the 3
3 additional landowners who have requested service from EWAZ within the proposed service
4 territory.¹⁶ The MXAs provide for the advance of facilities generally referred to as “onsite” plant and
5 encompass those parts of a system that are devoted to serving only the properties of the developers
6 directly rather than supporting a share in common regional facilities like the WFAs.¹⁷ In addition to
7 the provisions governing the financing of onsite facilities, the MXAs contain provisions that would
8 not also be found in more ordinary main extension agreements regarding the payment of
9 administrative charges.¹⁸

10 II. DISCUSSION

11 The Staff recommended rates in the Revised Staff Report are a consequence of Staff’s
12 position that the WFAs should not be recognized for regulatory purposes.¹⁹ Generally, Staff agrees
13 that centralized treatment will enjoy economies of scale advantages over facilities that are constructed
14 with a more conservative scope in mind²⁰ subject to the specific circumstances of the case. However,
15 exceptions exist, and in any event, financing a large regional facility with advances in an entirely new
16 service territory is not appropriate in Staff’s view. For that reason and all the other reasons given,
17 Staff is recommending against use of the advanced funds provided under the WFAs for the financing
18 of the regional waste treatment facilities, which Staff recommends instead should be financed with
19 Company supplied capital, specifically equity.²¹

20 Staff further does not believe that the MXAs, as they are presently written, are appropriate.
21 However, the distribution level plant to be advanced to EWAZ through the MXAs is consistent in
22 terms of scope and total price with what would be appropriate for a new service territory of this
23 nature.²² In other words, Staff believes that a Main Extension Agreement process is appropriate to

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¹⁵ Exhibit A-1, attached Exhibit 13 at 39.

25 ¹⁶ Tr. at 47.

¹⁷ *Id.* at 46.

26 ¹⁸ Exhibit A-1, attached Exhibit 13 page 44.

¹⁹ Exhibit S-1, Attachment 2 at 2-6; Tr. at 203.

27 ²⁰ Tr. at 202-203.

²¹ Exhibit S-1 at 5, Recommendation 6.

28 ²² Tr. at 184-187.

1 resolve the advance of necessary facilities that directly serve new developments, and the projected
2 figures that the Company provided are reasonable. However, the additional provisions contained
3 within the Company's MXAs, such as the administrative fees, are inappropriate for inclusion in an
4 extension agreement of this type.²³ Therefore, Staff recommends against approving the Company's
5 MXAs but supports the inclusion of onsite costs equal to what the Company proposes.

6 **A. Regulatory Recognition of the WFAs Is Inappropriate.**

7 While Staff acknowledges that the Company is largely free to enter lawful agreements, Staff
8 has several concerns relating to the WFAs that Staff believes make them inappropriate for regulatory
9 purposes. Significant among Staff's concerns is that the impact of the specific terms of the WFAs
10 will cause rate-related problems for this particular system and embed difficult issues regarding rate
11 shock and gradualism as the system reaches its first general rate case. This can exert a pressure that
12 limits the Commission's discretion in the processing of CC&N expansions as a utility could,
13 effectively, claim an area to provide utility service prior to Commission involvement. Staff is also
14 apprehensive of the potential of other utilities which, if WFA's are not resolutely denied in this
15 instance, could try to emulate the same process. As explained by Staff witness Bob Gray,

16 [T]he real crux of the difference is how -- the treatment of the WFAs. And I think,
17 from Staff's perspective, recognizing those for ratemaking purposes would be a very
18 bad precedent and that, you know, it doesn't provide EPCOR with a 100 percent lock
19 on these areas, but it certainly, if they, if agreements are entered into before there is a
CC&N and then the Commission recognizes those for ratemaking purposes, that could
send a signal to other companies to conduct similar actions.

20 Approving WFAs may give rise to other utilities employing similar agreements to develop
21 momentum toward securing a CC&N and in the same way confine the Commission's exercise of
22 judgment in the evaluation of a CC&N application. Finally, Staff is concerned that approving a
23 system financed in the manner proposed by the WFAs could lead to financial health concerns over
24 the life of a system.

25 **1. WFAs Give Rise to Embedded Rate Shock Issues**

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28 ²³ Exhibit A-1, Attached Exhibit 13 page 44.

1 Staff recognizes that its recommended rates produce high initial rates. Staff believes that rates
2 for a new CC&N should be set so as to permit a utility to recover its cost of service and earn a
3 positive return at the end of its ordinary five year startup phase. Staff's recommended rates are high
4 because Staff rejects the use of advances or contributions of capital to fund off-site plant for a new
5 CC&N as well as Staff's view that a utility should have rates designed to earn a positive return at the
6 end of five years.

7 Though Staff's recommended rates are high, the Commission has approved high wastewater
8 rates before. The Commission set wastewater rates in the vicinity of \$100 recently in the case of Red
9 Rock.²⁴ In that case, the utility was undergoing its first rate case since the award of its CC&N.
10 Unfortunately, hoped for growth had not arrived as projected. Despite repeated extensions deferring
11 its first rate case (originally to be filed in the utility's fifth year of operation), when the rate case was
12 finally filed ten years after the decision approving the CC&N²⁵ the rate increase was consequently
13 steep. Although more modest, the Commission has also more frequently approved wastewater rates
14 in the vicinity of \$70 per month as well.²⁶

15 To avoid the difficult and predictable issues of rate shock in the future, Staff believes it is
16 more appropriate to establish rates on cost of service principles at the outset. Setting rates
17 appropriately at the beginning will avoid a bait and switch scenario where customers pay
18 unrealistically low rates in the short term only to be pummeled later when rates are set to actually
19 recover the cost of service. As Mr. Gray explained on behalf of Staff:

20 Certainly I think it is reasonable for customers to at the get-go get an indication of
21 what their rates are likely to be long term instead of being there five years with low
22 rates and then seeing rate shock. And the Commission has experienced that in cases.
23 And nobody likes that. And it is better to get to year five and possibly reduce the rates
24 than get to year five and have to jack the rates up quite a bit.²⁷

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26 ²⁴ See e.g. Decision No. 75163 (July 15, 2015) at 21 (approving a phased in rate that culminates in a final phase rate of \$90.39 per month for 5/8 x 3/4 inch wastewater customers and \$135.59 per month for 3/4 inch customers).

27 ²⁵ *Id.* at 5-6.

28 ²⁶ See e.g. Decision No. 72488 (July 25, 2011) at 13 (approving a \$70.00 monthly wastewater minimum); Decision No. 71119 (June 5, 2009) at 14 (approving a \$70.75 monthly minimum).

²⁷ Tr. at 208.

1 As Ms. Hubbard testified on behalf of EWAZ, the Company will eventually seek to move
2 their rates to a point where they are recovering their cost of service, perhaps as soon as the system's
3 first rate case at the end of the five year initial period.²⁸ Accepting EWAZ's invitation to set rates
4 below cost can reasonably be anticipated to set this system on a trajectory for rate shock issues when
5 the rates are raised to meet the cost of service.²⁹

6 Staff's concern also extends to the difficulty likely to be encountered in subsequent cases,
7 when the Commission will have to issue appropriate orders regarding this system's future.
8 Embedding a rate shock issue at this point will predictably place the Commission in a difficult
9 position at the time the transition is made to set rates on cost of service for this system. As explained
10 by Staff in hearing, it is probable that such a circumstance will trigger significant numbers of
11 ratepayer complaints.³⁰ The issue is further complicated owing to the proximity of the system to
12 other EWAZ systems that are already grappling with system consolidation issues and tensions
13 between ratepayers complaining of subsidized utility systems.³¹ Staff believes that setting rates
14 appropriately now will diminish woes of this nature for this system in the future.

15 The Company may contend that the rate shock issues are exaggerated to the extent that they
16 only occur because of Staff's unwillingness to acquiesce on the regulatory recognition of the WFAs.
17 Staff recognizes that injection of contributed or advanced capital may be appropriate to fund growth
18 within a system.³² The oft repeated mantra of growth paying for growth was commonly referenced as
19 a policy basis for the approval of Hook Up Fees ("HUF") for several utility CC&Ns. However, Staff
20 believes that HUFs should be reserved for systems that already have customers.

21 As indicated by Mr. Gray testifying on behalf of Staff, the issue is what party should
22 appropriately bear the risks associated with growth.³³ HUFs are appropriate for an established system
23 because they protect existing ratepayers from the risks associated with new growth.³⁴ If the growth
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25 ²⁸ *Id.* at 96.

26 ²⁹ *Id.* at 208.

27 ³⁰ *Id.* at 207-208.

28 ³¹ *See* Consolidated Docket W-01303A-09-0343 *et al.*

³² Tr. 206.

³³ *Id.* at 197-199, 206-207.

³⁴ *Id.* at 207.

1 does not occur, existing ratepayers are not burdened with having to make the utility whole on
2 investments made to serve growth that never materialized. Staff maintains that for a new system,
3 however, the risk should be borne by the utility.³⁵ Though a regional facility offers possible
4 economies of scale, it also comes with a total cost³⁶ and operational expenses scaled beyond the
5 immediate needs of the initial customer base. Against the risk that a customer base of commensurate
6 scale is not realized, Staff believes it is inappropriate for developers (and by extension, ratepayers) to
7 bear that risk.

8 Notwithstanding that the developers are the parties providing the advanced capital under the
9 WFAs, the Commission has experienced circumstances where accelerated refunds of advances to
10 developers have burdened ratepayers with large rate increases over short time frames. In the 2009
11 rate case for EWAZ's predecessor, Arizona-American, a developer worked with the utility to receive
12 balloon repayments of advanced funds that increased rate base by more than \$20 million.³⁷ The
13 conversion of so much advanced capital into rate base led to difficult and protracted proceeding.³⁸ As
14 such, Staff's concerns regarding the WFAs remain even though the investment in the off-site
15 facilities is entirely funded by developers rather than the utility.

16 Likewise, regulatory acknowledgement of WFAs would also set a bad precedent by incenting
17 other utilities to develop non-regulatory inertia prior to engaging the Commission through the CC&N
18 application process which also could have the effect of confining the Commission's discretion. Staff
19 contends that the Commission is best equipped to make reasonable and appropriate awards of
20 CC&Ns when an application is not muddied by extraneous distractions. The WFAs are just such an
21 extraneous consideration. Due to the WFAs in question, the Company has already expended
22 substantial monies, not just to acquire non-Commission regulatory approvals such as its Maricopa
23 Association of Governments ("MAG") 208 permit,³⁹ but also to pay Global Utilities for the transfer

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³⁵ *Id.* at 199.

25 ³⁶ *See e.g.* Tr. at 132 (testimony of Teresa Hunsaker explaining that build out of the full MAG 208 planning area of
26 10,882 acres using the \$8,750 per acre advance rate under the WFAs produces \$95 million total plant cost upon build out;
see also Tr. at 155 (questions posed by EWAZ counsel suggesting the total cost at build out of the Loop 303 area will be
approximately \$150 million).

27 ³⁷ *See* Decision No. 72047 (January 6, 2011) discussion beginning at 24.

28 ³⁸ *See* December 14 and 15, 2010 Open Meeting Transcript, Consolidated Docket No. W-01303A-09-0343.

³⁹ *See e.g.* Tr. at 59 (discussing resource consuming nature of securing MAG 208 service area).

1 of the WFAs.⁴⁰ However, WFAs are not a requirement to obtain a service territory.⁴¹ The WFAs
2 have thereby introduced a potential source of pressure to grant EWAZ a CC&N that is not based on a
3 criterion upon which a CC&N application is appropriately considered.

4 Finally, pursuant to the WFAs, the Company has already begun collecting monies from
5 developers for the construction of the off-site facilities despite not possessing a CC&N yet for the
6 territory.⁴² Not only does this method of approaching a new CC&N conflict with the wastewater
7 CC&N rules which prohibits operations prior to receiving a CC&N,⁴³ it raises a further non-
8 regulatory distraction that can limit the Commission's discretion to make sound regulatory
9 determinations regarding the award of service territories. By permitting collection of funds from
10 landowners in advance of the grant of a CC&N, the WFAs develop inertia by the landowners to see
11 the utility participant in the WFA ultimately receive the CC&N.

12 However, the Commission has received competing applications for service territories
13 before.⁴⁴ And the Commission is also no stranger to battles between otherwise equally situated utility
14 applicants where landowner preferences further complicated the regulatory analysis.⁴⁵ Consequently
15 WFAs introduce yet another pressure that can result in *de facto* securing a service territory for a
16 utility prior to obtaining Commission award of the CC&N.

17 2. WFAs Are an Inappropriate Model for New CC&Ns

18 Additionally, to the extent that favorable treatment in this case could prompt other utilities to
19 emulate the WFAs, Staff has concerns about how the WFAs operate. The WFAs provide for the
20 funding of operations through advances. To the extent that the obligation to refund advanced funds
21 under the agreement does not necessarily rise to the level of rendering the agreements debt, Staff is
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23 ⁴⁰See e.g. Tr. at 69 (discussing EWAZ's purchase of Global Utilities' interest in WFAs).

24 ⁴¹See e.g. A.A.C. R14-2-602(B).

24 ⁴²Tr. at 46-47.

25 ⁴³A.A.C. R14-2-602(B)(1).

25 ⁴⁴See e.g. Consolidated Docket No. W-01445A-06-0199 *et al.* (concerning complaint and competing CC&N applications
26 of Global Utilities and Arizona Water Company); Consolidated Docket No. W-01427A-14-0134 *et al.* (concerning
26 competing CC&N applications of Liberty Utilities (Litchfield Park Water and Sewer) and Valley Utilities Water
26 Company).

27 ⁴⁵See e.g. Procedural Order dated January 12, 2007, Consolidated Docket No. W-01445A-06-0199 (granting intervention
27 to multiple developers and landowners); see also Docket No. W-01445A-03-0559 (continuing dispute surrounding award
28 of CC&N between CC&N recipient water utility and landowner to be served within CC&N).

1 concerned that advanced capital is sufficiently similar to debt that it would be inappropriate to use
2 such funds to finance operating expenses during the system's startup phase. Staff acknowledges that
3 advances are not in fact debt. Nonetheless, it is inappropriate to fund startup operations with monies
4 that the Company is obliged to return. As funds expended to pay for initial operating expenses are
5 refunded, the corresponding amount is converted into rate base, producing a circumstance where rate
6 base not linked to depreciable plant or land will be embedded in rate base in perpetuity. Additionally,
7 funding startup operations is a risk of doing business, and as a general proposition, entrepreneurial
8 risks are appropriately borne by the equity invested in an enterprise, not funds subject to refund. Staff
9 maintains that the risk of startup operations is a risk that should be borne by the utility, not ratepayers
10 upon whom the developers who originally advanced the funds shift the risk when advances are used.

11 Also, because this application has been styled as a new CC&N rather than an extension of an
12 existing CC&N, Staff analyzed it using the criteria applied to a new CC&N. The significance of this,
13 in addition to affecting Staff's views regarding the use of third party advanced or contributed capital
14 as the foundation the utility is built on extends also to the long term viability of the system.

15 In the long term, a stand-alone system needs to anticipate that plant constructed to provide
16 service will eventually wear out in the ordinary course and thus require replacement. When the plant
17 is funded with either equity or debt, the utility recoups its original investment as depreciation
18 expense. In addition to this recovery of the original investment, the utility earns a return on the
19 investment that corresponds either to the cost of equity or the cost of debt. Earning a suitable return
20 on investment improves the attractiveness of the system for further investment for both expansions of
21 equipment as well as replacement.

22 However, when the bulk of the facilities are funded with advanced or contributed capital,
23 concerns arise as to how the utility will finance the eventual replacement of worn out plant. The
24 utility does not gain depreciation expense nor earn a return on advanced or contributed plant.
25 Further, to the extent that it does not entirely refund advanced plant, outstanding balances of
26 advanced capital will convert into permanent contributions eventually. As a consequence, the system
27 and its ratepayers will likely face problems when the utility must eventually seek out infusions of
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1 either debt or equity to finance necessary capital replacements. Likewise, the Commission has
2 echoed Staff's concerns in previous cases.⁴⁶

3 In response, the Company notes that this system, while proposed as a stand-alone system, is
4 still a part of a larger utility and one that has access to capital markets.⁴⁷ Staff would respond that the
5 Company's position is not a response to Staff's concerns. Whereas the Staff rates produce a positive
6 return by the end of the fifth year of system operations, the Company's rates do not.⁴⁸ Rates that do
7 not produce positive returns are not likely to prove attractive investment opportunities to capital
8 markets.

9 While Staff expects, and the Company has confirmed through the testimony of Ms. Hubbard,
10 that it will eventually seek rates that produce a positive return,⁴⁹ this eventuality only reinforces
11 Staff's concerns about an inevitable steep rate increase, which will be necessary to transition the
12 system into an economically viable concern. For this reason and all those previously provided, Staff
13 believes that approval of the use of funds advanced through the WFAs will program undesirably large
14 rate increases into the DNA of this new system.

15 **B. The MXAs Are Inappropriate In Content.**

16 Staff also disagrees with the Company as to the suitability of the MXAs. Staff recognizes that
17 the Commission's rules do not require the approval of wastewater MXAs.⁵⁰ However, upon
18 examination of the MXAs that the Company intends to use, Staff has observed that there are
19 components to them that are inappropriate for inclusion within an MXA. Principal among these is
20 the inclusion of administrative costs within the MXAs.

21 The Commission's rules regarding wastewater collection main extension agreements set out
22 the requirements for such agreements. The rules do permit the collection of a deposit that is
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26 ⁴⁶ See e.g. Decision 71414 at 9-10 (discussing long term problems of a utility with too much contributed or advanced
capital relative to equity investment supporting its rate base).

27 ⁴⁷ Tr. at 71, 79, 93, 119.

28 ⁴⁸ Exhibit S-1 Attachment 2 at 5; Tr. 107, 135.

⁴⁹ Tr. at 96.

⁵⁰ See A.A.C. R14-2-606 (Collection Main Extension Agreements).

1 applicable toward the cost of constructing facilities.⁵¹ The deposit is to be for the purpose of
2 preparing detailed plans, specifications or cost estimates.⁵²

3 Pursuant to the MXAs, the developers are obliged to reimburse the Company for fees and
4 expenses related to various functions including inspection of facilities during construction, legal fees
5 and other matters undertaken by the Company to secure regulatory approvals. The MXA provides
6 that these fees that are described as administrative costs will be supplied to the Company by way of
7 an advance of \$7,500.⁵³ Confusingly, the following paragraph of the MXA specifically removes the
8 administrative costs collected pursuant to Paragraph 7 of the MXA from being considered
9 advances.⁵⁴ Consequently, the administrative costs do not appear to be advances subject to refund
10 and are simply a cash payment to the Company.

11 The inclusion of costs that are not for the purpose of developing detailed plans, specifications
12 or cost estimates is inconsistent with the Commission's rules. To the extent that the MXAs provide
13 through the \$7,500 administrative cost for legal expenses and obtaining regulatory approvals, the
14 MXAs provide for the recovery of costs that are not provided for pursuant to the rules concerning
15 uses of the deposit. Staff recommends that the Company use MXAs that comply with the provisions
16 set forth in A.A.C. R14-2-606 Collection Main Extension Agreements.⁵⁵

17 For these reasons, Staff recommends against approval of the MXAs. However, Staff does
18 find that the proposed amounts relating to onsite facilities that were to be financed through the MXAs
19 are reasonable projections of appropriate facilities to serve at the distribution level.

20 **C. Mapping of the Service Area**

21 A final issue relates to the precise area that would be subject to inclusion within a new CC&N
22 if granted. Staff indicated at hearing that accurately mapping the area requested by EWAZ with the
23 exceptions described in the legal descriptions was proving challenging. Staff also recommended
24 inclusion of the land that was excluded from the application as it would be impractical for an
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26 ⁵¹ A.A.C. R14-2-606(A)(3).

27 ⁵² *Id.*

28 ⁵³ Exhibit A-1, attached Exhibit 13 at 44, Paragraph 7.

⁵⁴ *Id.* at 45, Paragraph 8.

⁵⁵ Exhibit S-1 at Page 5, Recommendation 11.

1 alternative service provider to enter the territory and establish service within the exception areas that
2 largely consisted of ditches and similar insubstantial carve outs. Upon conclusion of the hearing,
3 Staff was to work with the Company to provide updated mapping showing the respective
4 recommendations.

5 Following discussions with representatives of EWAZ, Staff is of the understanding that the
6 Company agrees to Staff's recommendation to simply include the excepted areas as part of the new
7 service territory. Consequently, the legal descriptions provided with the Revised Staff Report are
8 accurate for purposes of described the service territory. Staff has identified that the inclusion of these
9 excepted areas will result in the service territory finally being 4,717 acres in area.

10 **III. CONCLUSION**

11 For all the above stated reasons, Staff believes that its recommendations are appropriate and
12 should be adopted.

13 RESPECTFULLY SUBMITTED this 26th day of August, 2015.

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15 _____
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23 Original and thirteen (13) copies of the
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25 2015, with:

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